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Solar Trust of America, LLC, Solar Millennium, Inc.,
CA I-10 Solar, LLC, Palo Verde Solar I, LLC,
Palo Verde Solar II, LLC, Blythe Solar Power Project
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MMR GROUP, INC.,
MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC,

Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
SOLAR MILLENNIUM, INC., CA I-10
SOLAR, LLC, PALO VERDE SOLAR I, LLC,
PALO VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**SECOND STIPULATION TO
EXTEND DEFENDANTS' TIME TO
RESPOND TO AMENDED
COMPLAINT AND [PROPOSED]
ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request that the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by one week from November 14, 2011 to November 21, 2011.

On November 4, the parties requested, and this Court granted, a one-week extension of time for Defendants to respond to the Amended Complaint from November 7 to November 14, 2011 because the parties were in advanced stages of settlement discussions. The parties have made significant progress in settlement discussions during the last week and expect to execute a settlement agreement forthwith. Because the parties ask only for another one-week extension, the parties’ request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants’ time to respond to the Amended Complaint by one week from November 14, 2011 to November 21, 2011.

1 Dated: November 11, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Aaron Renenger

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18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and*
21 *Blythe Solar Power Project Unit 4, LLC*

22 Dated: November 11, 2011

**WATT, TIEDER, HOFFAR
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Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: 11/14/11

31 UNITED STATES DISTRICT COURT

